IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO _____ DIVISION

Jame	s Jamison	
(Enter Above th	he Name of the Plaintiff in this Action)	
(Enter above the	vs. + 1.ppman and associates e name of the Defendant in this Action) itional Defendants, please list them: - nna Jimenez	J. BARRETT M.J. BOWMAN
		RECEIVED
		JAN 2 1 2021
	COMPLAINT	RICHARD W. NAGEL Clerk Of Court CINCINNATI, OHIO
I. Parties to t	he action:	
Plaintiff:	Place your name and address on the lines below. The address you go the court may contact you and mail documents to you. A telephone of the court may contact you and mail documents to you. A telephone of the court may contact you and mail documents to you. A telephone of the court may contact you and mail documents to you. A telephone of the court may contact you and mail documents to you. A telephone of the court may contact you and mail documents to you. A telephone of the court may contact you and mail documents to you. A telephone of the court may contact you and mail documents to you. A telephone of the court may contact you and mail documents to you. A telephone of the court may contact you and mail documents to you. A telephone of the court may contact you and mail documents to you. A telephone of the court may contact you and mail documents to you. A telephone of the court may contact you and mail documents to you. A telephone of the court may contact you and mail documents to you. A telephone of the court may contact you and mail documents to you. A telephone of the court may contact you and mail documents to you. A telephone of the court may contact you and mail documents to you. A telephone of the court may contact you are contact y	
	Telephone Number	

If there are additional Plaintiffs in this suit, a separate piece of paper should be attached immediately behind this page with their full names, addresses and telephone numbers. If there are no other Plaintiffs, continue with this form.

fendant(s):
the name and address of each Defendant you listed in the caption on the first page of this Complaint. This is invalid unless each Defendant appears with full address for proper service.
Stuart lippman and associates
Name-Full Name Please 5447 E. 5+h Street Ste 110 Tucson, AZ 85711-2345
Address: Street, City, State and Zip Code
Roxanna Jimenez
5447 E. 5th street Ste 110 Tucson, AZ 85711-2345
83711-8313
REGRE
If there are additional Defendants places list their names and addresses are a secret placet of const
If there are additional Defendants, please list their names and addresses on a separate sheet of paper.
ject Matter Jurisdiction
ck the box or boxes that describes your lawsuit:
Title 28 U.S.C. § 1343(3)
[A civil rights lawsuit alleging that Defendant(s) acting under color of State law, deprived you of a right secured by federal law or the Constitution.]
Title 28 U.S.C. § 1331 [A lawsuit "arising under the Constitution, laws, or treaties of the United States."]
Title 28 U.S.C. § 1332(a)(1) [A lawsuit between citizens of different states where the matter in controversy exceeds \$75,000.]
Title 15 United States Code, Section 1692 [Other federal status giving the court subject matter jurisdiction.]

II.

III	Stat	ement	of CI	aim

Please write as briefly as possible the facts of your case. Describe how each Defendant is involved. Include the name of all persons involved, give dates and places.

Number each claim separately. Use as much space as you need. You are not limited to the papers we give you. Attach extra sheets that deal with your statement claim immediately behind this piece of paper.					
"See Attachment"					
See Attachment"					

IV.	Pre	ious	lawsu	its

If you have been a Plaintiff in a lawsuit, for each lawsuit state the case number and caption. (Example, Case Number: 2:08-cv-728 and Caption: John Smith vs. Jane Doe).

Case Number	Caption		
_N/A	NA	vs. <u>N/A</u>	
		vs	
		vs	

V. Relief

In this section please state (write) briefly exactly what you want the court to do for you. Make no legal argument, cite no case or statutes.

Stuart lippman and associates Violated
the Fair debt Collection practice act
and defendant Jimenez relief for
Statuory damages 500,000 thousand
dollars relief for monetary damages
OF 500,000 thousand relief for
Punitive damages of 2,000,000 million
dollars and relief for Compensatory
damages of 1,000,000 million dollars
deFendants pay Court Cost
"See attached"

I sta e under penalty of perjury that the foregoing is true and correct. Executed on

this _____ day of _________, 20 <u>2 (</u>

Signature of Plaintiff

(1)

The plaintiff states there is two defendants in this Case stuart-lippman and associates a Collection agency and Roxanna Jimenez a employee that works For Stuart-lippman and associates. On november 8, 2020 the plaintiff was involved in a auto car accident the other individual that was involved in the auto Car accident had gerco insurance as the individual insurance paid For the Car damages From the auto accident the Sum of 6.388 61 the plaintiff states that the claim adjuster From geico insurance nor anyone from geico insurance Contacted the plaintiff or the other individuals that was involved in the Car accident and ask what happened as to the car accident the claim adjuster did not tack to the plaintiff or the other individuals until weeks later by then gerco insurance claims adjuster had already determined that the plaintiff was liable For the Cardamages geico insurance adjuster Solely went by the Crash police report which was ultimately incorrect and wrong and inacurrate geico insurance turn the car repair damages which was 6,388 61 over to a collection agency Called Stuart-lippman and associates the plaintiff received a letter From stuart lippman and associates about the 6388 bidebt the plaintiff called the number that was on the letter and came



in Contact with defendant Roxanna Jimenez as she was the one that was handling the debt as defendant Jimenez explained to the plaintiff that she was a debt Collector attempting to Collect adebt as defendant Jimenez explained to the plaintiff that he was responsible For paying 6,388.61 For a auto accident the plaintiff immediately told defendant Jim enez that he is disputing the 6388.61 Cardamages and that he was also disputing the car accident because he was not at Fault as to the Car accident and that this matter will be going to Court defendant Jimenez told the plaintiff that She will be Submitting documents to the bmv to have your license suspended For Faiting to pay the Cardamage debt of 6388.61 the plaintiff Called the defendant Jimenez a Few days later as defendant Jimenez Stated to the plaintiff that she is a debt collector attempting to collect a debt as defendant Jimenez inquired to the plaintiff about the debt of 6388.61 as the plaintiff again told deFendant Jimenez that he is disputing the 6,388.61 and the Car accident because he was not at Fault as to the Car accident and the plaintiff again told deFendant Jimenez that this matter is going to Court because he was not at Fault as to the car accident and that he do not owe 6388.61 as defendant Jimenez toid the

Plaintiff again that she is Submitting documents to the bmv to have your license Suspended in Fact deFendant Jimenez also Sent documents to the bow to have the plaintiff Sister martina Jamison license Suspended as well as she was not even involved in the Car accident nor apart of the car accident as the plaintiff Contacted deFendant Jimenez and ask her When did she Send the documents to the bow to have my license Suspended she told the plaintiff december 7, 2020 also the Same as the plaintiff Sister martina Jamison as the notice to the bow is directing the bow to Suspend the plaintiff and his Sister martina Jamison license For Car damages and not providing Proof of insurance the plaintiff States that he was insured at the time of the Car accident and provided that information that he was insured to the bmv as the plaintiff Sister martina Jamison Covid not Provide Proof of insurance because she was not involved in the Car accident nor was She driving the Carthat was involved in the Car accident that day the plaintiff States that he did not disclose his insurance information to defendant Jimenez because he told deFendant Jimenez that he is disputing the Car accident and the Car damages OF 6,388.61 because he was not at Fault in the car accident the plaintiff also told defendant Jimenez that the Police



Crash report was totally wrong incorrect, and not accurate and totally False and that this matter was pending in Court the plaintiff states that he was not about to pay For car damages for a car accident that he was not at Fault For and all this matter was pending in Court the only Concern that defendant Jimenez was Concern about was the plaintiff paying the 6,388 61 debt as she toid the plaintiff that this debt was not going away. The plaintiff did some investigation as to the Collection agency whether a collection agency could send documents to the bmv to have someone license Suspended the plaintiff Contacted Civil attorney's and used goggle and to these responses it states that a Collection agency which is a general rule: collection agencies Cannot have your Driver's license Suspended more specifically, a creditor or Collection agency has no power to tell the Dmu or any other State agency what to do including telling them to suspend or cancel adriver's license also states a Creditors and Collections agencies have absolutely no authority to take away your license or Compel the ohio Bureau of motor Vehicles to do so also states Debt Collectors Canit request a license to be suspended or anything to do with Dmv it is a violation of the fair debt Collection Practice act For Collectors to threaten to do things that Can't legally be done

report this to the Consumer Financial protection bureau and or contact your state attorney general the plaintiff states that he Filed Complaints with Consumer Financial Protection bureau and the State attorney general against Stuart lippman and associates and Stated that they violated the Fair debt Collection Practice act the plaintiff States that he was in Contact with defendant Jimenez yet again defendant Jimenez told the plaintiff that they was required to send documents to the bow that involved uninsured motorists the plaintiff told defendant Jimenez that he was insured at the time of the accident but the plaintiff Failed to disclose his insurance information due to the Fact he was not at Fault in the Car accident and the police crash report was totally wrong, False, incorrect and not accurate at all the plaintiff ask defendant Jimenez Can she provide the plaint. FF documents where it states that a Collection agency is required to send documents to the bond about Suspending Someone license or Uninsured motorists defendant Jimenez told the plaintiff that she have to talk to her manager the plaintiff told defendant Jimenez that the documents he seen defendant Jimenez is telling the bow to Suspend the plaintiff and his sister martina Jamison Driver license See attached Exhibits the plaintiff ask defendant Jimenez what was there Fax number Jimenez Complied



the plaint. FF Sent document to Stuart I ppman and associates where the document states that a Creditor or Collection agency has no power to tell the Dmv or any other state agency what to do including teiling them to suspend or Cancel adrivers license and that what defendant Jimenez exactly did directed and told the bow to suspend the plaintiff and his sister martina Jamison Driver's license defendant Jimenez once upon a time told the plaintiff that Stuart lippman and associates is the client of Geico insurance the plaintiff stated that Geico insurance did not submit documents to the bow to have the plaint. FF and his Sister license Suspend Stuart lippman and associates and defendant Jimenez did as this is a Collection agency as the plaintiff read and submitted documents to stuart lippman and associates that states again a debt Collector Can't request a license to be suspended or anything to do with Dmv it's a violation of the Fair debt Collection Practice act therefore Stuart lippman and associates and defendant Jimenez Violated the Fair debt Collection Practice act as the plaintiff is asking For Statutory damages. The plaintiff states that he received a phone Call From defendant Jimenez manager michelle medina as the Plaintiff told her that stuart lippman and associates and defendant Jimenez Violated the



Fair debt Collection practice act by Submitting documents to the bow to have the plaintiff and his Sister martina Jamison Driver's license Suspended michelle medina stated that they are required to send notice to the bond of uninsured motorists as the plaintiff told michelle medina that he had insurance at the time of the accident but was not disclosing his insurance information because the plaintiff was not at Fault as to the Car accident the police Crash report Was Wrong False inaccurate and incorrect and that this matter is still pending in Court the plaintiff also ask michelle medina to provide him documents where it states that a Collection agency is required to submit documents to the bonv as to uninsured motorists or to submit documents to have Someone license Suspended because what the plaintiff has the documents is directing the bow to suspend the plaintiff and his sister martina Jamison Drivers license the plaintiff also told michelle medina that he Filed Complaints with Consumer Financial Protection bureau and the state attorney Office as michelle medina Confirmed she knew that and she also Confined that the plaintiff Submitted documents to Stuart lippman and associates as to the Collection agency what they was not allowed to do Submit documents to the bout to have some one license suspended

michelle medina also told the plaintiff that she could not provide any documents that states that a Collection agency is required to submit documents to the bow as to an Uninsured motorists or show documents that a Coilection agency Can send documents to the bond to have someone license suspended michelle medina states that she can not show that the plaintiff states exactly that stuart-lippman and associates or defendant Jimenez or michelle medina Could not provide any documents to the plaintiff that States that this Collection agency Stuart lippman and associates and its employees as well as defendant Jimenez is required to Submit documents to the bow as to an uninsured motorists or to send documents to the bow to have some one license Suspended as michelle medina ended the Cail the plaintiff States that the only people that cantell the bow what to do is the Court System not a Collection agency at which Stuart lippman and associates is a Collection agency that Submitted documents to the bonv to have the plaintiff and his sister martina Jamison Driver's license Suspended the plaintiff states that he Cailed defendant Jimenez yet again when she identified it was the plaintiff she immediately transfered the plaintiff Call to a supervisor and his name was Justin Pavis as the plaintiff

told Justin Davis that Stuart lippman and associates and defendant Jimenez Violated the Fair debt collection practice act by Submitting document's to the bow to have the plaintiff and his sister martina Jamison Driver license Suspended the plaintiff explained to Justin Davis that a Collection agency Cannot Submit document to the brow to have someone license suspended and that was a Violation of the Fair debt Collection practice act the plaintiff told Justin Davis that he already Filed Complaints with the Consumer Financial Protection Dureau and that state attorney general as Justin Davis Confirmed he knew that Justin Davis also Confirmed that he seen the documents that the plaintiff had sent to Stuart lippman and associates as to a Collection agency Cannot Submit documents to the bout to have someone license Suspended and that is a violation of the Fair debt Collection practice act as Justin Davis said to the plaint. FF i See you know how to use google well the plaintiff also told Justin Davis that he had talked to Some attorneys about this as the attorneys Confirmed to what the plaintiff was talking about Justin DAVIS Stated to the plaintiFF that the employees at Stuart lippman and associates was required to Submit documents to the bow as to uninsured motorists this was the Samething that defendant Jimenez and

michelle medina Said to the plaintiff before the plaintiff told Justin Davis Can he provide the plaintiff documents that states that a Collection agency is required to submit documents to the bow as to uninsured motorists as Justin Davis Could not provide documents that state that as defendant Jimenez and michelle medina Could not provide those documents as those documents does not exist because defendant Jimenez, michelle medina or Justin Davis Could not Provide the documents to the plaintiff the plaintiff then told Justin Davis that the documents he has that was from defendant Jimenez it's telling the bow to suspend the plaintiff and his Sister martina Jamison Driver's license the plaintiff also ask Justin Davis can he provide documents stating that a Collection agency Can submit documents to the bow to have Someone Drivers license Suspended as Justin Davis Could not Provide those documents Just like defendant Jimenez and michelle medina Could not either because those documents do not exist Justin Davis also stated to the plaintiff that Stuart lippman and associates are client of Geico insurance the plaintiff stated to Justin Davis that Geico insurance did not Submit any documents to the bow to have the plaintiff and his Sister martina Jamison Drivers license Suspended Stuart lippman and

associates a Collection agency and defendant Jimenez is the ones that Submitted documents to the bow to have the plaintiff and his Sister martina Jamison Driver's license Suspended as the general rule: Collection agencies cannot have your Driver's license suspended Collection agency has no power to tell the Dmv or any other State agency what to do including telling them to suspend or Cancel a drivers license as stuart lippman and associates a Collection agency and defendant Jimenez directed and toid the bow to suspend the plaintiff and his Sister martina Jamison Driver's license they Completely Violated the Fair debt Collection Practice act the plaintiff also told Justin Davis that he did have insurance on the day of the accident Justin Davis ask For the plaintiff insurance information the plaintiff told Justin Davis that he is not giving his insurance information because all this Stuff his still pending and pending Court dates and the police Crash report was False, inaccurte, wrong, incorrect and that the plaintiff was not at Fault of the auto accident and therefore the plaintiff declined to Provide his insurance information as the Conversation ended with the plaintiff and Justin Davis. The plaintiff states that he Was in contact with Geico insurance claim adduster Eric day the plaintiff told eric Jay that the police Crash report

was not right it's wrong incorrect and not accurate and it's False eric Jay ask the plaintiff does he have pictures of the Car the plaintiff said yes and sent the pictures of the Car to eric Jay the plaintiff ask eric Jay why have noone From Geico Contact me and ask what happen in the Car accident as he Couldn't really answer that question the plaintiff also ask ericlay have he talked to the other individuals that was involved in the Car accident he Said no so the plaintiff stated to eric Jay that Geico insurance Solely Went by the police Crash report with out even talking to all the individuals that was involved in the Car accident eric Jay said yes the plaintiff got upset and told eric Jay that the police crash report was wrong, False, inaccurate and not correct and that the Crash report did not happen like that as the plaintiff told eric Jay what happen as to the Caraccident eric Jay then reviewed the police Crash report and reviewed the photo's of the Carthat was involved in the car accident eric Jay vitimately had determined that the police crash report indeed had incorrect information and determined that the plaintiff was not at Fault in the Car accident and determined that the driver of the 2013 toyota Prius is to be 100 liable For the accident that happened on 11/08/2020 Gerco insurance

claim adjuster eric Jay recalled and closed the account on 01/07/2021 therefore the plaintiff was not liable to pay For the Car damages of 6388.61 the plaintiff had already Filed Complaints with Consumer Financial Protection bureau and the state attorney General against Stuart lippman and associates the plaintiff also states that the damages had already been done by the Collection agency of Stuart lippman and associates and defendant Jimenez by Submitting document to the bow to have the plaintiff and his sister martina Jamison Driver's license Suspended and according to Some attorneys and google black and white a Collection agency cannot Submit documents to the Dmv to have someone license Suspended the only people that have power and authority to tell the Dmu what to do is the Court system not a Collection agency therefore Stuart lippman and associates and defendant Jimenez Violated the Fair debt Collection practice act the plaintiff Further states the he had to appeal his and appeal his sister martina Jamison Driver license Suspension because of the error by Geico insurance and Stuart lippman and associates the bow is trying to make the plaintiff and his Sister martina Jamison pay reinstatement Fee's For a Car accident that the plaintiff or his Sister martina Jamison was not at Fauit of

Geico insurance error in the beginning by not talking to all the individuals that was involved in the Car accident had Geico insurance would have talked to the plaintiff in the beginning the plaintiff Could have been provided Geico photo's of the Vehicle and Geico would have never held the plaintiff liable For the Car accident and for Car damages after the plaintiff provided photo's of the vehicle to Geico claim adjuster eric Jay that when eric Jay determined that the plaintiff was not at Fault in the Car accident and recalled and closed the Case the plaintiff states that if he wouldve provided his insurance information to the stuart lippman and associates employee they would had to reimburse the plaintiff insurance Company For the Car damages of 6,388.61 because geico insurance adjuster eric Jay had Found that the plaintiff was not liable or at Fault in the Car accident the plaintiff is last stating that defendant Jimenez, michelle medina and Justin Davis Stated that they is required to send documents to the bmu as to Uninsured and directing the bow to Suspend Someone license as a spoke person For Stuart lippman and associates in a response to the plaintiff Complaint with the Consumer Financial bureau the spoke person stated that the process is legal and legitimate but there was no documents seen by the plaintiff

that supported they theory that they is required to send document to the bmv as to a uninsured motorists or directing the bouto Suspend Someone license but the plaintiff did Send Stuart lippman and associates documents From google where it clearly states that a Collection agency has no power to tell the Dmv or any other state agency what to do including telling them to suspend or Cancel a driver's license with the documents that the plaintiff have see exhibits as stuart lippman and associates and defendant Jimenez directed the Dmu to Suspend the plaintiff and his Sister martina Jamison Driver's license as Stuart lippman and associates and defendant Jimenez Violated the Fair debt Collection Practice act as the plaintiff law suit is For statuory damages of the Fair Debt Collection Practice Act 15 U.S.C. 1692 as the plaintiff demand a Jury trial the plaintiff also states that Stuart lippman and associates defendant Jimenez shared information with b.m. v bureau of motor vehicle / D.m. V Department of motor Vehicle defendant Jimenez Shared information and stated that the plaintiff and his Sister martina Jamison owe's 6.388.61 For Cardamages that's also a Violation of the Fair debt collection practice act of sharing information to the b.m. Vlor D.m. V the plaintiff is now asking For relief that Stuart lippman and associates

and defendant Jimenez Violated the Fair debt Collection Practice act by Submitting documents to the b.m. V bureau of motor Vehicle for Dmv Department of motor Vehicle to have the plaintiff and his Sister martina Jamison Driver's license suspended which they had no authority to do that or telling the b.m.v/or D.m. v what to do as stuart lippman and associates is a collection agency the Court system is the only people that can tell the b.m. vlor D.m. v what to do not a Collection agency Stuart lippman and associates and defendant Jimenez also shared information with the b.m. v bureau of motor Vehicle for D.m. V Department of motor Vehicle Stating that the plaintiff and his Sister martina Jamison owe 6388. 61 For Car damages the plaintiff also asking For relief of statuory damages of 500,000 thousand dollars the plaintiff also asking relief for monetary damages of 500,000 thousand dollars the plaintiff also asking relief for Punitive damages of 2,000,000 million dollars and relief For Compensatory damages of 1,000,000 million dollars and the defendants to pay court cost

Respectfully Submitted



Stuart-Lippman And Associates, Inc. 5447 E 5th St., #110 Tucson, AZ 85711-2345 Phone: (520) 881-5900 Toll Free: (800) 880-5400 Fax: (520) 318-6799 Hours of Operation Are Mon-Fri From 7:00AM to 5:00PM and Sat From 8:00AM to 12:00PM AZT

December 7, 2020

Ohio Bureau of Motor Vehicles Financial Responsibility Section P.O. Box 16520 Columbus OH 43216-6520

Exhibit A

RE:

Our Client : Geico-MidWest Our Insured : Vesselin Shanov Our File No

: 4509066 Date of Loss : 11/08/20

If this is not resolved, the following will be forwarded to the Department of

Please contact this office immediately so that arrangements may be made and any further action may be stopped, or send a certified check or money order.

Stuart-Lippman and Associates, Inc., represents the interests of Geico-MidWest. A reimbursement was paid to their insured Vesselin Shanov in the amount of \$6,388.61 and repayment for the damages has not been received from the uninsured or at-fault party. We have enclosed documents to substantiate the loss. Please notify our office of action taken.

Following is information on the individual(s) financially responsible:

: James Jamison

Driver's Address : 7925 Annesdale Dr Cincinnati OH 45243-4061 Driver's License No : SQ562906

Driver's Birth Date : 04/07/74

Vehicle Owner's Name : Martina Jamison

Vehicle Owner's Address : 1607 Asmane Ave 16 Cincinnati OH 45229

Please provide the following

[X] If the above named driver's privileges have been suspended.

[X] If privileges have not been suspended, please proceed.

Sincerely, STUART-LIPPMAN & ASSOCIATES, INC.

SLM Client Services Account #: 4509066

This is an attempt to collect a claim. Any information obtained will be used for that purpose. This communication is from a professional debt collector.



Stuart-Lippman And Associates, Inc. 5447 E 5th St., #110 Tucson, AZ 85711-2345 Phone: (520) 881-5900 Toll Free: (800) 880-5400 Fax: (520) 318-6799 Hours of Operation Are Mon-Fri From 7:00AM to 5:00PM and Sat From 8:00AM to 12:00PM AZT

December 7, 2020

Jamison, Martina 1607 Asmane Ave 16 Cincinnati, OH 45229

Exhibit B

Dear: Martina Jamison

As per your request, below is a list of the accounts placed with our office for collection. If you have any questions please contact our office at (800) 880-5400 and reference the file number listed below.

CHECKS RETURNED FOR NON-PAYMENT/INSUFFICIENT FUNDS WILL BE CHARGED A \$25.00 SERVICE FEE.

Client/Responsible Party Charge Account # Charge		STATEMENT			MINGED A	A \$25.00	
4509066	Date 11/08/20	Charged \$6,388.61	Interest \$0.00 Responsible	Pees \$0.00 Party:	Paid \$0.00 Jamison, James	Other Charges	Balance 6,388.61
Plan		\$6,388.61	\$0.00	\$0.00	\$0.00		,388.61
Please contact						14. Marinoure 114.00	,300.61

Please contact this office immediately so that arrangements may be made and any further action may be stopped, or send a certified check or money order.

Thank you,

Stuart-Lippman and Associates, Inc.

DSC/012617-1

Case: 1:21-cv-00050-MRB-SKB Doc #: 1-2 Filed: 01/21/21 Page: 23 of 34 PAGEID #: 28



OHIO DEPARTMENT OF PUBLIC SAFETY BUREAU OF MOTOR VEHICLES

NOTICE OF SUSPENSION

12/30/2020

Exhibit C

3338A/015844056/123020/SS20010214/00117 JAMES A JAMISON 7925 ANNESDALE DR CINCINNATI OH 45243

This is your official notice of suspension, cancellation, or revocation. Ohio Revised Code (R.C.) 4501.022 allows the registrar to send notices by regular mail.

For general questions about the Ohio BMV including, but not limited to, license and registration fees, directions, and printing forms, please visit www.bmv.ohio.gov

IMPORTANT CASE INFORMATION

KEY NUMBER: 015844056

BMV CASE NUMBER: SS20010214

SECURITY DEPOSIT REQUIRED: \$3,284.02

ACCIDENT DATE: 11/08/2020

CLAIMANT NAME: STUART-LIPPMAN AND ASSOCIATES

ADDRESS:5447 E 5TH ST TUCSON AZ 85711PH : (520) 881-5900

SUSPENDED: 01/29/2021

MANDATORY SUSPENSION: 01/29/2021 TO 11/08/2022

REINSTATEMENT FEE: NOT REQUIRED

FRA REQUIRED: NOT REQUIRED CLAIM/FILE#: 4509066

The Ohio Bureau of Motor Vehicles (BMV) has received a Crash (Accident) Report alleging that you were the driver or owner of a vehicle involved in an accident without insurance or other proof of financial responsibility.

IF YOU DID HAVE INSURANCE, THIS FORM MUST BE COMPLETED AND SIGNED BY BOTH YOURSELF AND YOUR INSURANCE AGENT OR YOU CAN SUBMIT A LETTER FROM YOUR INSURANCE AGENT ON COMPANY LETTERHEAD TO INCLUDE THE FOLLOWING INFORMATION:

NAME OF INSURANCE COMPANY	ADDRESS OF INSURANCE COMPANY		
NAME IN WHICH POLICY WAS ISSUED	POLICY	NUMBER	
EFFECTIVE DATES OF POLICY. EFFECTIVE DATES MUST REF	LECT DATE OF ACCIDENT	FROM	ТО
SIGNATURE OF INSURANCE AGENT OR AUTHORIZED REPRESENTATIVE		DATE	
ADDRESS OF ABOVE AGENT OR REPRESENTATIVE		AGENT PHONE # (REQUIRED)	
YOUR SIGNATURE		DATE	

1. Failure to provide proof that liability insurance was in force at the time of the accident will result in the above mandatory suspension of your driver license. If you were the owner of the vehicle involved, the registration and plates of that vehicle and all others owned by you will also be suspended. Once placed under this suspension, reinstatement requirements include payment of the above reinstatement fee and maintain Financial Responsibility insurance continuously for the FRA period as specified above. This suspension is based on R.C. 4509.101.

You must mail your driver license and plates to us on or before the beginning date of the suspension. If these items are mailed before the beginning date of the suspension, the above reinstatement fee will be reduced by \$50.00.

- 2. If you were UNINSURED at the time of the accident, you must also settle the claim made against you for the damages in this accident. This suspension is based on R.C. 4509.17.
 - a. Provide an agreement to settle the damages by making payments to the other party involved, OR

b. Provide a release from the other party involved, OR

c. Send the above referenced amount (security deposit) to the BMV.

Failure to comply with 2a, b, or c will result in a two year Security Suspension of your driving and registration privileges.

By law you have the right to make a written request for an administrative hearing for suspensions 1 (Noncompliance) and 2 (Security Suspension). Please refer to Appendix 2 and / or 3 for details (enclosed).

For additional information, see Appendix 1 on the back of this letter.

Registrar.

Ohio Bureau of Motor Vehicles

BMV 3338A 1/18 [760-0998]

Case: 1:21-cv-00050-MRB-SKB Doc #: 1-2 Filed: 01/21/21 Page: 24 of 34 PAGEID #: 29



OHIO DEPARTMENT OF PUBLIC SAFETY BUREAU OF MOTOR VEHICLES

NOTICE OF SUSPENSION

12/30/2020

Exhibit D

3338A/017720059/123020/NC20110768/00114 MARTINA ALEXANDRA JAMISON 1607 ASMANE AVENUE APT 16 **CINCINNATI OH 45229**

This is your official notice of suspension. cancellation, or revocation. Ohio Revised Code (R.C.) 4501.022 allows the registrar to send notices by regular mail.

For general questions about the Ohio BMV including, but not limited to, license and registration fees, directions, and printing forms, please visit www.bmv.ohio.gov

IMPORTANT CASE INFORMATION

KEY NUMBER: 017720059

BMV CASE NUMBER: NC20110768 SECURITY DEPOSIT REQUIRED: \$3,284.02

ACCIDENT DATE: 11/08/2020

CLAIMANT NAME: STUART-LIPPMAN AND ASSOCIATES

ADDRESS:5447 E 5TH ST TUCSON AZ 85711PH : (520) 881-5900

SUSPENDED: 01/29/2021

MANDATORY SUSPENSION: 01/29/2021 TO INDEFINITE

REINSTATEMENT FEE: \$150.00

FRA REQUIRED: 01/29/2021 TO 01/29/2024

CLAIM/FILE#: 4509066

The Ohio Bureau of Motor Vehicles (BMV) has received a Crash (Accident) Report alleging that you were the driver or owner of a vehicle involved in an accident without insurance or other proof of financial responsibility.

IF YOU DID HAVE INSURANCE, THIS FORM MUST BE COMPLETED AND SIGNED BY BOTH YOURSELF AND YOUR INSURANCE AGENT OR YOU CAN SUBMIT A LETTER FROM YOUR INSURANCE AGENT ON COMPANY LETTERHEAD TO INCLUDE THE FOLLOWING INFORMATION:

NAME OF INSURANCE COMPANY	ADDRESS OF INSURANCE COMPANY		
NAME IN WHICH POLICY WAS ISSUED	POLICY NUMBER		
EFFECTIVE DATES OF POLICY. EFFECTIVE DATES MUST REF	LECT DATE OF ACCIDENT	FROM	ТО
SIGNATURE OF INSURANCE AGENT OR AUTHORIZED REPRESENTATIVE		DATE	
ADDRESS OF ABOVE AGENT OR REPRESENTATIVE		AGENT PHONE # (REQU	IRED)
YOUR SIGNATURE		DATE	

1. Failure to provide proof that liability insurance was in force at the time of the accident will result in the above mandatory suspension of your driver license. If you were the owner of the vehicle involved, the registration and plates of that vehicle and all others owned by you will also be suspended. Once placed under this suspension, reinstatement requirements include payment of the above reinstatement fee and maintain Financial Responsibility insurance continuously for the FRA period as specified above. This suspension is based on R.C. 4509.101.

You must mail your driver license and plates to us on or before the beginning date of the suspension. If these items are mailed before the beginning date of the suspension, the above reinstatement fee will be reduced by \$50.00.

- 2. If you were UNINSURED at the time of the accident, you must also settle the claim made against you for the damages in this accident. This suspension is based on R.C. 4509.17.
 - a. Provide an agreement to settle the damages by making payments to the other party involved, OR

b. Provide a release from the other party involved. OR

c. Send the above referenced amount (security deposit) to the BMV.

Failure to comply with 2a, b, or c will result in a two year Security Suspension of your driving and registration privileges.

By law you have the right to make a written request for an administrative hearing for suspensions 1 (Noncompliance) and 2 (Security Suspension). Please refer to Appendix 2 and / or 3 for details (enclosed).

For additional information, see Appendix 1 on the back of this letter.

Registrar,

Ohio Bureau of Motor Vehicles

BMV 3338A 1/18 [760-0998]

GEICO Communication ID: <6K5rbhw+xLgS6PhCKVghiSIKtasSBJFYv7QUJ4IVSVLNt+4Ja8gUVCmJrDVEM55E>- Do Not Modify

From: myclaim@geicomail.com (myclaim@geicomail.com)

To: jamesjamison17@yahoo.com

Date: Tuesday, January 19, 2021, 04:34 PM EST

James Jamison Your Claim Number: 0176796960101063

GEICO Casualty Company

Exhibit E

IMPORTANT Claim Information

**Responses to this email will be sent to the adjuster handling your property damage claim.

Hello James Jamison,

Per your request this letter is to provide you with a claims update on the accident that occurred on 11/08/2020. GEICO has deemed the driver of the 2013 Toyota Prius to be 100 liable for the accident that happened on 11/08/2020. GEICO did review the police report and all of the information that it had to offer. Based off of the points of impact on Mr. James Jamison car, GEICO does not feel like he is responsible at this time. Please let GEICO know if you have any further questions.

If you need to contact me or have any questions, please respond to this email. You can also attach and send me any documents in regards to your claim. You may also view your claim at geico.com or the GEICO Mobile App.

Sincerely,

Eric Jay

Please Note: When replying to this email, please do not change the subject line. This specific subject is needed to make sure I receive your message.

THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHOM IT IS ADDRESSED, OR FOR WHOM IT IS INTENDED, AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL, AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW, IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION, OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS MESSAGE IN ERROR, PLEASE NOTIFY THE SENDER IMMEDIATELY AND PERMANENTLY DELETE AND/OR DESTROY THE ORIGINAL AND ANY COPIES/PRINTOUTS OF THIS MESSAGE IF YOUR RESPONSE TO THIS MESSAGE EXCEEDS 50 MB, YOUR REPLY WILL NOT BE DELIVERABLE.

GEICO Casualty Company One GEICO Plaza, Washington, D.C. 20076

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Exhibit E



Complaint Detail

Complaint No. 973257

Consumer:

James Jamison

2823 PRESTON ST

CINCINNATI, OH 45206-1316

(513)975-7968 ext. daytime

Date Entered: 12/14/2020

Supplier:

Stuart-Lippman & Associates

5447 E 5TH ST

Ste 110

TUCSON, AZ 85711-2344

(520)881-5900 ext. daytime (800)880-5400 ext. daytime

Email: jamesjamison17@yahoo.com Collections, Credit Reporting, or Financial Services/Collections/Collection Calls

Solicited Via: Mail

Exhibit F

Purchase Information:

Problem Area:

Attempt to collect a debt

Purchase Date:

11/8/2020

Total Price:

\$6388.61

Disputed Amount:

\$6388.61

Amount Paid So Far:

\$0.00

Auto Information:

Make:

n/a

Model:

n/a

Year:

1900

Purchase Mileage: Current Mileage:

0

Warranty Type:

#Error

VIN:

n/a

Description:

on november 8 2020 i james jamison was invovled in a auto car accidnet the other person involved in the car accident the insurance geico insurance paid for they car damages which was 6,388.61 geico insurance sent the auto repairs to a collection agency called stuart-lippman and associates i was in contact with a individual name roxanna jimenez i told her theat i am disputing the car accident and the cost in court because i was not at fault in the car accident roxanna jimenez told me that this collection is not going away and if I dont pay the 6,388.61 she was going to submit to the dmv to have my license susended as I talk to roxanna jimenez numerous time she again told me if I dont pay the 6,388.61 she was going to submit to the dmv to have my license suspended again I told roxanna jimenez that im fighting this matter in court i did some research to see if a collection agency could submit documents to the dmv to have someone license susended come to find out a collection agency can not submit documents to the dmv to have someone license suspended its a violation of the fair debt collection practice for a collector to threaten to do things that cant legally be dont and to contact consumer financial protection bureau and contact state attorney general i contacted roxanna jimenez and ask her when did she submit docments to the dmv to have my license suspended she told me december 7 2020 then i also receive the papers where she sent the documents to the dmv to have my license suspended i also ask roxanna jimenez what her fax number i sent her documents to let her no what she did was wrong and that she violated the fair debt collection practice act because she has no power and no authority to tell the dmv what to do only the court system has the power to tell the dmv what to do not a collection agency as she repeatdly with threats telling me if I dont pay the 6,388.61 she was go send documents to the dmv to have my license suspended which she did on december 7 2020 as i will pursue this matter in

Satisfactory Solution:

the damages is done

Case: 1:21-cv-00050-MRB-SKB Doc #: 1-2 Filed: 01/21/21 Page: 28 of 34 PAGEID #: 33

Due to the nationwide impacts of the coronavirus (COVID-19), it may take us longer than usual to answer your call.

We are still processing complaints and you can check the status of an existing complaint online.



(https://www.consumerfinance.gov/)

◀ All complaints (.)

201220-5815947

CLOSED

Exhibit G



Submitted

STATUS

Submitted to the CFPB on 12/20/2020

PRODUCT

Debt collection

ISSUE

Threatened to contact someone or share information improperly

We received your complaint. Thank you.

We will review your complaint. Depending on what we find, we will typically:

- Send your complaint to the company for a response; or
- Send your complaint to another state or federal agency, or help you get in touch with your state or local consumer protection office; or
- Let you know if we need more information to continue our work.

YOUR COMPLAINT

this is a new complaint with reguards to stuart-lippman and associates a collection agency as i was involved in a accident on november 8 2020 as the other person involved in the auto accident they insurance company which was geico insurance paid for they car damage of 6,388.61 as geico insurance turned over the amount of the car repairs to stuart-lippman and associates as i was in contact with a person name roxanna jimenez who work for stuart-

Case: 1:21-cv-00050-MRB-SKB Doc #: 1-2 Filed: 01/21/21 Page: 29 of 34 PAGEID #: 34

1/21/2021

Complaint Detail

lippman and associates collection agency as she stated she attempting to collect a debt which was 6,388.61 i told her i am disputing the car accident because i was not at fault in the auto accident because i did not run a red light so roxanna jimenez told me that she is submitting documents to the dmv to have my license suspended as she told me this more than once if i dont pay the 6,388.61on december 7 2020 roxanna jimenez submitted documents to the dmv to have my license suspended as i did some research and talk to some attorneys with legal aid a collection agency can not submit documents to the dmv to have my license suspended thats a violation of the fair debt collection practice act i faxed the documents to stuart-lippman and associates that states that a collection agency can not submit documents to the dmv to have to someone license suspended as roxanna jimenez did that on december 7 2020 i contacted roxanna jimenez and ask her can she show me documents that state that a collection agency can submit documents to the dmv to have my license suspended she told me she will have to contact her manager her manager michelle mcnear contacted me and i ask her also can she show me any type of documents that states that a collection agency can submit documents to have someone license suspended she told me she cant show such documents of that i ask her repeatdly and i also told her that a collection agency can not submit documents to the dmv to have someone license suspended she said yes they can i said again can you provide me documents that states that she said she cant also on my first complaint in a response to my complaint a person said that the collection agency is required by our clients to notify the appropriate state agency that handle responsibiltiy issues as i want stuart -lippman and associates to provide documents to me stating that a collection agency can subit documents to the dmv to have someone license suspended as i provided documents to stuart-lippman and associates that they can not do that because they dont have the power to tell the dmv what to do only the court system can not a collection agency so im requesting documents from thus collection agency stating they can subit documents to the dmv to have someone license suspended as this place is in violaton of the fair debt collection practice act

View full complaint •

Sent to company

STATUS

Sent to company on 12/20/2020

We've sent your complaint to the company, and we will let you know when they respond.

Their response should include the steps they took, or will take, to address your complaint.

Companies generally respond in 15 days. In some cases, the company will let you know their response is in progress and provide a final response in 60 days.



Company still working

STATUS

Company response is in progress as of 1/4/2021

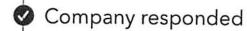
The company has responded that it is still working on your issue

In some cases, companies need more time to respond. You should receive a final response within 60 days from the date we sent your complaint to the company.

COMPANY'S INTERIM RESPONSE

Stuart-Lippman and Associates, Inc. is investigating the complaint and will provide a full response shortly.

Exhibit H



STATUS

Company responded on 1/11/2021

RESPONSE TYPE

Closed with non-monetary relief

Company's Response

SLA REFERENCE NUMBER: 4509066; CREDITOR NAME: GEICO-MIDWEST; CREDITOR ACCOUNT NUMBER: 0176796960101063; STATUS: RETRACTION ISSUED, ACCOUNT RECALLED & CLOSED 1/7/2021; Stuart-Lippman & Associates, Inc. (SLA) has received your December 20, 2020 complaint filed with the Consumer Financial Protection Bureau and understands you state that on 11/8/2020, you were involved in car accident that resulted in damages totaling \$6,388.61. You state that the insurance company Geico never contacted you, instead Geico sent the claim to SLA. You further state you disputed the debt with SLA and advised you do not owe the debt as you were not at fault. You further advised you are pursuing the matter in court. Despite this, you state SLA submitted documents to the department of motor vehicles (DMV) to have your driver's license suspended, which was done. You believe this is a violation of the Fair Debt Collection Practices Act (FDCPA). You complain that you asked for documents evidencing SLA's authority to have your license

1/21/2021 Complaint Date

suspended, but none has been provided. You request your driver's license be re-instated. Based upon our research, SLA's findings are as follows: This matter relates to an insurance claim arising from a tort. Except for limited exceptions (that do not apply to this matter), the FDCPA does not apply to the collection of insurance subrogation debts arising out of tort claims because they do not arise out of a consumer credit transaction. As such, the FDCPA is not applicable to this matter. On November 30, 2020, Geico-MidWest placed the above referenced matter with SLA. As permitted by law and as required by SLA's contract with the creditor, SLA notified the DMV that the vehicle you were driving in the accident was uninsured, as stated in the accident police report. The DMV thereafter determines what course of action is needed. In this case, the DMV determined that license suspension was required. This process is legal and legitimate. On January 7, 2021, Geico-MidWest notified SLA that the police report contained incorrect information and you are not the responsible party regarding this matter. As such, SLA has notified the DMV and submitted a "retraction notice" Attached is a copy of the retraction notification sent to the DMV. The creditor has recalled the account. SLA has closed the account and returned it to the creditor. You may contact the creditor directly for any further questions. *SLA Compliance Department **This communication is from a debt collector.

DESCRIPTION OF NON-MONETARY RELIEF

Retraction issued & account closed

ATTACHMENTS

4509066 RP J. Jamison RETRACTION LTR.pdf (98.2 KB)

Feedback provided

STATUS

Feedback provided on 1/16/2021

Your feedback

THE COMPANY'S RESPONSE ADDRESSED ALL OF MY ISSUES

No

ADDITIONAL COMMENTS

the fact here is that stuart lippman and associates is a collection agency and they have no right to submit documents to the bmv to have someone licence suspended they do not have the authority to tell the bmv what to do only the court system has the authority to tell the bmv what to do not a collection agency as the collection agency said that they can do that and send documents to the bmv telling the bmv to suspend someone licesnse i ask the collection agency to provide me documents stating that they can send documents to the

1/21/2021 Complaint Detail

bmv to have someone license suspended the collection agency said they cant because they dont have such documents that can verify that then the fact geico the insurance company that sent the documents to stuart lippman and associates the collection agency after geico insurance company did further investigation as to the car accident they determined that i was not at fault in the car accident as the police report contained inaccurate information but here the damages was done because stuart lippman and associates had already sent documents to the bmv to have our license suspended and i told the person at stuart lippman and associates that we is disputing the car accident and the 6,388.61 because i was not at fault in the car accident and look what happen geico insurance determined that i was not at fault in the car accident when i told the person at stuart lippman and associates that im disputing the accident and the 6,388.61 she should have never submitted documents to the bmv to have our license suspended again stuart lippman and associates violated the fair debt collection practice act as i sent documents to stuart lippman and assocaites that state that a collection agency can not submit documents to the bmv to have someonce license suspended but stuart lioppman and associates did any way so therefore they violated the fair debt collection practice act and i will be pursing this matter further in a court proceeding

I UNDERSTAND THE COMPANY'S RESPONSE TO MY COMPLAINT

No

ADDITIONAL COMMENTS

the fact here is stuart lippman and associates is a collection agency and it states that a collection agency can not submit docments to the bmv to have someone license suspended plain and simple no matter what stuart lippman and associates say they violated the fair debt collection practice act and the fact that gecio insurance did further investigation and determined that i was not at fault in the car accident and my case was closed

THE COMPANY DID WHAT THEY SAID THEY WOULD DO WITH MY COMPLAINT No

ADDITIONAL COMMENTS

the company did nothing period

What happens now?

The complaint process is complete and your complaint is now closed.

We have taken the following additional actions on your complaint:

- We added your complaint to the CFPB's Consumer Complaint Database (http://www.consumerfinance.gov/data-research/consumer-complaints).
- Your feedback, and feedback from others, helps us understand how companies are addressing concerns raised by consumers in their complaints. We will also share your

can a debt collector submit to the dmy to suspend you licence

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Search instead for can a debt collector submit to the dmv to suspend you licence

Exhibit

About 481,000 results (0.67 seconds)

Suspended. ... More specifically, a creditor or collection agency has no power The General Rule: Collection Agencies Cannot Have Your Driver's License to tell the DMV or any other state agency what to do, including telling them to

suspend or cancel a driver's license. Jun 19, 2018

X

www.freeadvice.com > legal > loss-of-drivers-license-whe...

12/11/2020

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www.columbuscriminalattorney.com > Legal Blog

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About 24,600,000 results (0.58 seconds)

If you are in a lot of debt, you may have heard that your license can be suspended

to take away your license or compel the Ohio Bureau of Motor Vehicles to do so. until you pay. ... Creditors and collections agencies have absolutely no authority

| ↑ 3 ♦ | ■ De... Debt

X CLOSE

the answer, tall the Diviv and ask.

- ♠ homemaker1 2 points · 1 year ago
- Did the police make a accident report, at the scene?
 - ♠ [deleted] 3 points · 1 year ago
 - We never called the police, just exchanged info.
 Continue this thread →
- ♠ SecretlyAnAdult 2 points · 1 year ago
- Definitely a scare tactic and illegal. Debt collectors can't request a license to be suspended or anything to do with DMV. It is a violation of the Fair Debt Collection Practices Act for collectors to threaten to do things that can't legally be done. Report this to the Consumer Financial Protection Bureau and/or contact your state attorney general.

X

https://www.reddit.com/r/personalfinance/comments/b1wls0/debt_collector_threatening_to_request_a_drivers/

1/11

Exhibit J